

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: _____
INDEPENDENT PET PARTNERS) Chapter 11
HOLDINGS, LLC, *et al.*,¹) Case No. 23-10153 (LSS)
Debtors.) (Joint Administration Requested)
_____)

**NOTICE OF (I) FILING OF BANKRUPTCY PETITIONS AND RELATED
DOCUMENTS AND (II) AGENDA FOR HEARING ON FIRST DAY PLEADINGS
SCHEDULED FOR FEBRUARY 7, 2023 AT 10:30 A.M. (ET), BEFORE
THE HONORABLE LAURIE SELBER SILVERSTEIN AT THE UNITED STATES
BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE²**

The hearing will be conducted in-person for Delaware counsel. Out-of-town counsel/participants can appear remotely by registering with the Zoom link below NO LATER THAN February 7, 2023 at 9:00 a.m. (ET)

Please use the following link to register for the hearing:

https://debuscourts.zoomgov.com/meeting/register/vJltcOCgqjwpE87iG4Yr7xQu03L990uK_CQ

After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing. You must use your full name when logging into Zoom or you will not be allowed into the meeting.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Independent Pet Partners Holdings, LLC (5913), Independent Pet Partners Intermediate Holdings I, LLC (4827), Independent Pet Partners Intermediate Holdings II, LLC (7550), Independent Pet Partners Employer Holdings, LLC (6785), Independent Pet Partners Employer, LLC (7531), Independent Pet Partners Intermediate Holdings, LLC (8793), IPP - Stores, LLC (6147), IPP Stores Employer, LLC (0847), Especially For Pets, LLC (6801), Pet Life, LLC (3420), Whole Pet Central, LLC (7833), Natural Pawz, LLC (5615), and Pet Source, LLC (1905). The corporate headquarters and the mailing address for the Debtors is 8450 City Centre Dr., Woodbury, MN 55125.

² All motions and other pleadings referenced herein are available free of charge by visiting the Debtors' case website at <https://omniagentsolutions.com/IPP> or by request to the Debtors' proposed counsel (Brenda Walters, paralegal, at bwalters@ycst.com).

PLEASE TAKE NOTICE that, on February 5, 2023, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the following voluntary petitions (collectively, the “Petitions”) for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), and related pleadings with the Clerk of the United States Bankruptcy Court for the District of Delaware. The Debtors continue to operate their businesses as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

PETITIONS AND RELATED PLEADINGS

1. **Voluntary Petitions**
 - A. Independent Pet Partners Holdings, LLC [[Case No. 23-10153](#)]
 - B. Independent Pet Partners Intermediate Holdings I, LLC [[Case No. 23-10154](#)]
 - C. Independent Pet Partners Intermediate Holdings II, LLC [[Case No. 23-10155](#)]
 - D. Independent Pet Partners Employer Holdings, LLC [[Case No. 23-10156](#)]
 - E. Independent Pet Partners Employer, LLC [[Case No. 23-10157](#)]
 - F. Independent Pet Partners Intermediate Holdings, LLC [[Case No. 23-10158](#)]
 - G. IPP - Stores, LLC [[Case No. 23-10159](#)]
 - H. IPP Stores Employer, LLC [[Case No. 23-10160](#)]
 - I. Especially For Pets, LLC [[Case No. 23-10161](#)]
 - J. Pet Life, LLC [[Case No. 23-10162](#)]
 - K. Whole Pet Central, LLC [[Case No. 23-10163](#)]
 - L. Natural Pawz, LLC [[Case No. 23-10164](#)]
 - M. Pet Source, LLC [[Case No. 23-10165](#)]
2. Declaration of Stephen Coulombe in Support of Chapter 11 Petitions and First Day Pleadings³ [[Docket No. 2](#)]

PLEASE TAKE FURTHER NOTICE that a hearing with respect to the following first day pleadings (collectively, the “First Day Pleadings”), to the extent set forth below, is scheduled for **February 7, 2023 at 10:30 a.m. (ET)** (the “First Day Hearing”) before The Honorable Laurie Selber Silverstein, United States Bankruptcy Judge for the District of Delaware, 824 N. Market Street, Floor 3, Courtroom 2, Wilmington, Delaware 19801.

FIRST DAY PLEADINGS GOING FORWARD

3. Motion of Debtors for Entry of an Order Authorizing the Joint Administration of Debtors’ Chapter 11 Cases [[Docket No. 3](#)]
Status: This matter will be going forward.
4. Debtors’ Application for Entry of an Order Appointing Omni Agent Solutions as Claims and Noticing Agent, Effective as of the Petition Date [[Docket No. 4](#)]

³ The location of this declarant is Boston, Massachusetts.

Status: This matter will be going forward.

5. Motion of Debtors for Entry of an Order (I) Authorizing Debtors to (A) File a Consolidated List of Creditors in Lieu of Submitting a Separate Mailing Matrix for each Debtor, (B) File a Consolidated List of the Debtors' Thirty Largest Unsecured Creditors and (C) Seal Certain Personally Identifiable Information for Individual Creditors and Interest Holders, and (II) Granting Related Relief [[Docket No. 5](#)]

Status: This matter will be going forward.

6. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Wages, Salaries, and Other Compensation, (II) Authorizing Continuation of Employee Benefit Programs, (III) Authorizing Banks to Honor and Process Checks and Transfers Related to Such Employee Obligations, and (IV) Granting Related Relief [[Docket No. 6](#)]

Status: This matter will be going forward on an interim basis.

7. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Taxes and Related Obligations and (II) Authorizing Banks to Honor and Process Checks and Transfers Related to Such Prepetition Taxes and Related Obligations [[Docket No. 7](#)]

Status: This matter will be going forward on an interim basis.

8. Motion of Debtors for Entry of Interim and Final Orders (I) Approving Continued Use of Cash Management System; (II) Authorizing Debtors to Open and Close Bank Accounts; (III) Authorizing Banks to Honor Certain Transfers; and (IV) Granting Related Relief [[Docket No. 8](#)]

Status: This matter will be going forward on an interim basis.

9. Motion of Debtors for Entry of Interim and Final Orders Authorizing Debtors to (I) Continue Their Insurance Program, (II) Continue to Finance Insurance Agreements, and (III) Pay All Prepetition and Postpetition Obligations With Respect Thereto, and (IV) Authorizing Banks to Honor and Process Checks and Transfers Related to Such Insurance Obligations [[Docket No. 9](#)]

Status: This matter will be going forward on an interim basis.

10. Motion of Debtors for Entry of Interim and Final Orders (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment, (II) Establishing Procedures for Resolving Objections and Requests for Additional Assurance from Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief [[Docket No. 10](#)]

Status: This matter will be going forward on an interim basis.

11. Motion of Debtors for Entry of Interim and Final Orders Authorizing Maintenance, Administration, and Continuation of Debtors' Customer Programs [[Docket No. 11](#)]

Status: This matter will be going forward on an interim basis.

12. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Claims of Critical Vendors, and (II) Granting Related Relief [[Docket No. 12](#)]

Status: This matter will be going forward on an interim basis.

13. Motion of Debtors for Entry of Interim and Final Orders (I) Authorizing Debtors to Assume Consulting Agreement Related to Store Closing Sales, (II) Authorizing and Approving the Conduct of Store Closing Sales, with Such Sales To Be Free and Clear of All Liens, Claims, And Encumbrances, (III) Authorizing and Approving Store Closing Procedures, (IV) Authorizing Customary Bonuses for Non-Insider Employees of Closing Stores, and (V) Granting Related Relief [[Docket No. 13](#)]

Status: This matter will be going forward on an interim basis.

14. Debtors' Motion for Entry of Interim and Final Orders Pursuant to 11 U.S.C. §§ 105, 361, 362, 363, 364, and 507 (I) Authorizing the Debtors to Obtain Postpetition Financing; (II) Granting Liens and Superpriority Administrative Expense Claims; (III) Authorizing the Use of Cash Collateral; (IV) Granting Adequate Protection to Prepetition Secured Parties; (V) Modifying the Automatic Stay; (VI) Scheduling Final Hearing; and (VII) Granting Related Relief [[Docket No. 14](#)]

Related Documents:

- A. Declaration of Adam Dunayer in Support of DIP Financing Motion⁴ [[Docket No. 15](#)]
- B. [SEALED] Notice of Filing of Agency Fee Letter [[Docket No. 16](#)]
- C. Notice of Filing of Redacted Agency Fee Letter [[Docket No. 17](#)]

Status: This matter will be going forward on an interim basis.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the First Day Pleadings may be made at the First Day Hearing.

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⁴ The location of the declarant is Dallas, Texas.

Dated: February 6, 2023
Wilmington, Delaware

Respectfully submitted,

/s/ Andrew L. Magaziner

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